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August 8, 2025

VIA ECF

Hon. Jeannette A. Vargas United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

Re: Haggai et al. v. Kiswani et al., No. 25-cv-2400-JAV

Dear Judge Vargas:

We represent Plaintiffs in the above-referenced action. Pursuant to Rule 3.E of the Court's Individual Rules and Practices in Civil Cases, we write to respectfully request an extension of time to respond to Defendants' five motions to dismiss the Second Amended Complaint and for other relief (the "Motions," ECF Nos. 69–82) until September 4, 2025. The Defendants consent to the extension.

Plaintiffs further request permission to file a single, oversized brief of up to 30,000 words that will jointly respond to all the Motions. That is fewer than the 30,151 words Defendants used in their three principal briefs (ECF Nos. 70, 72, and 80), one of which was a 12,789-word oversized brief (ECF No. 70). It is also substantially fewer words than Plaintiffs would be entitled to use if they individually responded to the Motions. This approach will streamline the briefing, avoid unnecessary duplication, and reduce the burden on the Court. Three of the five movants (Nerdeen Kiswani, Mahmoud Khalil, and Columbia-Barnard Jewish Voice for Peace) consent to the oversized brief. Two of the five movants (Maryam Alwan and Cameron Jones) do not consent on the ground that the Motions have substantial overlap.

Plaintiffs' responses are currently due August 15, 2025 (as to Columbia-Barnard Jewish Voice for Peace) and August 18, 2025 (as to the other Defendants). *See* Order dated July 2, 2025, ECF No. 64. This is Plaintiffs' first request to extend time to respond to the Motions. The purpose of the requested relief is to give sufficient time to prepare a single, comprehensive response to the Motions. Defendants have requested Plaintiffs' consent to file their reply briefs by September 26, 2025, and Plaintiffs have informed them that we consent.

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No appearance before the Court is currently scheduled. We thank the Court for its consideration.

Respectfully submitted,

/s/ Richard A. Edlin Richard A. Edlin